

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<p>FABIENNE PIERRE-LOUIS,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>MIDLAND CREDIT MANAGEMENT, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p style="text-align: right;">21-602</p> <p>Case No. _____</p>
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**NOTICE OF REMOVAL**

Defendant, Midland Credit Management, Inc. (“Defendant” or “Midland”), by and through its undersigned counsel, hereby files this Notice of Removal pursuant to 28 U.S.C. §1441(a). The grounds for this removal are set forth as follows:

1. On or about April 16, 2021, Plaintiff, Fabienne Pierre-Louis (the “Plaintiff”), filed a Complaint in the Court of Common Pleas of Allegheny County, Pennsylvania entitled *Fabienne Pierre-Louis v. Midland Credit Management, Inc.*, at Docket Number AR-21-001737 (the “State Court Action”).

2. Pursuant to § 1446(a), a copy of the Complaint, which constitutes copies of all “process, pleadings, and orders” in the State Court Action is attached hereto as **Exhibit 1**.

3. Plaintiff’s Complaint alleges that Midland violated the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.* (hereinafter, the “FDCPA”), in connection with Midland’s alleged efforts to collect certain debt owed by Plaintiff.

4. Plaintiff’s action is a civil action over which this Court has original jurisdiction under 28 U.S.C. §1331 and is one which may be removed to this Court by Defendant pursuant to

the provisions of 28 U.S.C. §1441(a) because the Complaint alleges violations against Defendant under the FDCPA.

5. This Notice of Removal is being timely filed within thirty (30) days of receipt of the Complaint as required by 28 U.S.C. §1446(b).

6. Pursuant to 28 U.S.C. §1446(d), a copy of this Notice of Removal is being served upon Plaintiff and a copy is being filed with the Prothonotary for the Court of Common Pleas of Allegheny County, Pennsylvania.

7. A copy of the Notice of Filing of Notice of Removal, which is being filed with the clerk of the state court in which the action is pending (and which will be served on Plaintiff's counsel pursuant to 28 U.S.C. § 1446(d)), is attached hereto as **Exhibit 2**.

8. This Court is part of the “district and division” embracing the place where the Complaint was filed—Allegheny County, Pennsylvania—and so this Court is the proper venue for purposes of removal. 28 U.S.C. § 1446(a).

9. This Notice of Removal is signed pursuant to Fed. R. Civ. P. 11. *See* 28 U.S.C. § 1446(a).

10. If Plaintiff seeks to remand this case, or this Court considers remand *sua sponte*, Defendant respectfully requests the opportunity to submit such additional argument or evidence in support of removal as may be necessary.

**WHEREFORE**, Midland Credit Management, Inc. respectfully requests that this action be removed to the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

**BLANK ROME, LLP**

Dated: May 6, 2021

/s/ Michael P. Trainor

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*Counsel for Midland Credit Management, Inc.*

**CERTIFICATE OF SERVICE**

I, Michael P. Trainor, hereby certify that a true and correct copy of the foregoing document was served upon the following individuals via electronic and regular mail.

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/s/ Michael P. Trainor  
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